

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Mary Johnson,)
Plaintiff,) Case No. _____
vs.)
Elesienna, LLC; Elemaster US, Inc.,) **PLAINTIFF'S ANSWERS TO LOCAL**
Defendant.) **CIVIL RULE 26.01 INTERROGATORIES**

)

Plaintiff, Mary Johnson, pursuant to Local Civil Rule 26.01, states as follows:

- A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER:

The Plaintiff is presently unaware of any person or legal entity who may have a subrogation interest in each claim.

- B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER:

This is an action for damages incurred in violation of the Family and Medical Leave Act, 29 U.S.C. § 2615, and should be tried by jury as the Plaintiff is entitled to a trial by jury and has so elected same.

- C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of

which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER:

The party submitting these responses is not a publicly owned company.

Additionally, (1) the party submitting these responses is not a parent, subsidiary, partner, or affiliate of a publicly owned company, (2) no publicly owned company owns ten percent or more of the party submitting these responses, and (3) the party submitting these responses does not own ten percent or more of a publicly owned company.

- D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

ANSWER:

The Plaintiff resides in Lexington County, Defendant has substantial connections to and is doing business in Lexington County, and the operative events giving rise to this action and pleaded herein occurred in Lexington County, South Carolina.

Lexington County, South Carolina falls within the Columbia Division pursuant to 28 U.S.C. § 121(2).

- E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

No.

- F) *[Defendants only.]* If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER:

Not Applicable.

- G) *[Defendants only.]* If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER:

Not applicable.

Respectfully submitted,

TURNER & CAUDELL, LLC

By: s/Mary Allison Caudell

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April 2, 2020

Columbia, South Carolina